

July 6, 2021

United States Environmental Protection Agency
Region IX
Attention: Yvezee Lapada
75 Hawthorne Street
San Francisco, California 94015-3901
E-mail: lapada.yveezenikita@epa.gov

RE: Response No. 2 to Request for Information Under §114(a) of the Clean Air Act,
42 U.S.C. § 7414(a). Desert View Power LLC.

Ms. Lapada,

Desert View Power LLC ("DVP") is in receipt of the request by the United States Environmental Protection Agency ("EPA") for information under § 114(a) of the Clean Air Act by letter dated April 2, 2021 (the "Section 114(a) Request"). DVP submitted a request for extension on April 13, which EPA approved via email sent April 26.

In accordance with the approved extension request, DVP submitted responses to Sections 1-4; 7; 8; 10; 18-20 of Appendix C of the Section 114(a) Request on May 3, 2021. The remaining sections are included herewith, as well as the original submission.

For clarity, we have restated the questions as asked in Appendix C of the Section 114(a) Request and provided responses in red under each question with attachments referenced.

Please be advised that DVP requests that its responses to the Section 114(a) Request be treated as confidential business and/or confidential commercial information, and thereby exempt from disclosure under the Freedom of Information Act ("FOIA"). Applicable pages have accordingly been marked "Confidential FOIA Treatment Requested – FOIA Exempt."

Please feel contact me if you have any comments, questions or require additional information regarding any part of this submittal.

Respectfully submitted,

DESERT VIEW POWER LLC

By: 
Name: Mitchell Martin
Title: Operations & Engineering Director

cc: Roshni Brahmbhatt, EPA
Denise Leong, EPA
Robert Hines, Farella Braun + Martel LLP
Jonathan Dennis, Greenleaf Power

Statement of Certification

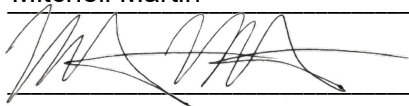
You are submitting the enclosed documents in response to the U.S. Environmental Protection Agency's ("EPA") Information Request, issued pursuant to Section 114(a) of the Clean Air Act, to determine compliance with the Clean Air Act and its affiliated regulations.

I certify that I am fully authorized by Desert View Power LLC to provide the above information on its behalf to EPA.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001 and 1341.

Date: July 6, 2021

Name (Printed): Mitchell Martin

Signature: 

Title: Operations & Engineering Director

Desert View Power LLC (“DVP”) submits this response subject to the following objections and reservations of rights:

- a) DVP objects to each request to the extent that it seeks documents protected from disclosure by the attorney-client privilege, attorney work product doctrine, confidential business information, or any other applicable privilege. Should any such disclosure by DVP occur, it shall not constitute a waiver of any privilege. DVP further expressly reserves the right to make further representations as necessary to assert that the information herein is exempt from public disclosure under the Freedom of Information Act (“FOIA”) and must not be disclosed.
- b) DVP incorporates by reference the general objection set forth above into each specific response set forth below.
- c) DVP expressly reserves the right to supplement any of the responses and objections herein, in one or more subsequent supplemental response(s).

Set forth below please find the questions asked in Appendix C of the Section 114(a) Request followed by DVP’s responses in **green**.



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1. Identify the following dates:
 - a. Initial construction date of the Facility;
1990 (limited records available to indicate specific date)
 - b. Initial date that the Facility combusted fuel;
1992 (limited records available to indicate specific date)
 - c. Initial date of commercial operation of the Facility, i.e. production and sale of electrical power;
February 1992
 - d. Date of your purchase or acquisition of the Facility;
January 2011
 - e. Date that the Facility ceased operation for any period that lasted a year or more (and identify the length of the time that the Facility was not producing power);
Not applicable, DVP has not ceased operations for a period of one year or more.
 - f. If the Facility is not currently operating, the date that it ceased operation; and
Not applicable, DVP is currently operating.
 - g. If the Facility is not currently operating, the expected date of recommencement of commercial operations.
Not applicable, DVP is currently operating.

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2. Identify the operating hours and days of the Facility.
Desert View Power is permitted to operate 8,760 hours/year. Typical operations are 24/7, with 3-4 weeks of scheduled maintenance per year.

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3. Provide a schematic diagram of the Facility that identifies each potential emission source (i.e. that emits any particulate or gaseous air pollutant), emission control device, and process step. Emission sources, or emission units, include, but are not limited to, the biomass-fired boiler, any auxiliary boilers, fuel and ash handling systems, portable chipping grinding equipment, conveyer systems, and internal combustion engines.

See "1.1 Site Plan". Items noted on the drawing are intended to match the information set forth in Table I.B. on page 5 in the Title V Operating Permit ("3.1 DVP Title V Permit-Final")

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4. Describe the following regarding how emissions are monitored at the Facility:

a. Identify each pollutant that is monitored;

By CEMS/COMS

- PM (Opacity as surrogate)
- NO_x
- SO_x
- CO

b. Describe the nature (i.e. stack tests, continuous monitoring, etc.) and the frequency (i.e. annual, monthly, continuous, etc.) of the monitoring; and Per the facility Title V permit, annual stack testing is required. The other pollutants identified in 4.a. are monitored by Continuous Emissions Monitoring System (CEMS) and a Continuous Opacity Monitoring System (COMS). As allowed by the Boiler MACT rule, HCl emissions are monitored using the SO₂ CEMS.

c. For each pollutant monitored, describe if it is monitored by a continuous emission monitoring system ("CEMS") or continuous opacity monitoring system ("COMS"), and indicate the dates that each CEMS and/or COMS was installed and became operational.

The following CEMS System Description and table are from the QA/QC plan (See p.10 of "4.1 Desert View 2014 CEMS QA QC"). Also provided is the SCAQMD certification of the current CEMS systems dated August 12, 2014 (See pp. 2-3 of "4.2 DVP Cecconi Speak Aug 12 2014 CEMS Final Certification")

CEMS System Description

The facility has two continuous emissions monitoring systems (CEMS), one for each boiler. The CEMS are fully extractive systems.

The CEMS measures concentrations of sulfur dioxide (SO₂) carbon monoxide (CO), carbon dioxide (CO₂), oxides of nitrogen (NO_x), wet and dry oxygen (O₂), opacity, and stack flow. All measurements are done on a real time basis.

The CEMS includes a programmable logic controller (PLC). The PLC communicates, via Ethernet, from the CEMS to the Data Acquisition and Handling System (DAHS) computer. The PLC transmits one-minute averages. Contact closures are provided for alarms and system status.

The system operates automatically so operator attention is necessary only for manual verification of accuracy and normal maintenance.

The table below shows the certified Analyzers Included in the CEMS. The CEMS has a calibration error test every 24 hours. Cylinder gas audits and COMS audits are performed quarterly and a certified relative Accuracy test

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(RATA) of the CEMS is performed annually.

CEMS Analyzer Data				
analyte	manufacturer, model	range(s)	units	serial #
NOx	California Analytical Instruments (CAI) ZRE-C2COS2NOO2P	0 - 100	PPM	CEMS #1: A3F4992T CEMS #2: A3F4993T
		0 - 500	PPM	
SO2	CAI ZRE-C2COS2NOO2P	0 - 50	PPM	
		0 - 500	PPM	
CO	CAI ZRE-C2COS2NOO2P	0 - 100	PPM	CEMS #1: C079037-2 CEMS #2: C079037-1
		0 - 500	PPM	
CO2	CAI ZRE-C2COS2NOO2P	0 - 20	%	
Dry O2	CAI ZRE-C2COS2NOO2P	0 - 25	%	
Wet O2	Ametek/Thermox WDG Wet O2	0 - 25	%	CEMS #1: C079037-2 CEMS #2: C079037-1
Opacity	Teledyne Monitor Labs Lighthawk 560 Dual Pass Opacity	0 - 100	%	5600142
Stack Flow	Dieterich Standard Model 70 Annubar	0 - 20	MDSCFH	

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5. Provide full copies of all emissions test reports and monitoring data conducted at the Facility for any reason, from January 1, 2016 to the present. Emission testing includes, but is not limited to, compliance testing, engineering testing, stack testing, capture efficiency testing, source testing, opacity data, compliance assurance monitoring (“CAM”), CEMS testing, and testing for general information.

- a. For each emissions test provide the following:

- i. List: Identify the emissions unit, the date of the test, and the test method(s) used. For each test during which the source was not operating at maximum design capacity, provide an explanation for why production was limited.

Test Year	Dates	Emission Source	Production
2016	Mar 1-2, Apr 10-11, May 10-12, Sep 6, Nov 11	EU-01	Not limited
2017	Mar 28-30, Apr 14, Jun 2, Aug 1, Nov 6 & 11	EU-01	Not limited
2018	Mar 27-31, May 30, Aug 13, Nov 21	EU-01	Not limited
2019	Mar 18-22, May 1 & 24, Jul 26, Nov 8	EU-01	Not limited
2020	Mar 10-12, Jun 1-3, Aug 21, Sep 9-10, Dec 14	EU-01	Not limited
2021	Mar 4-12	EU-01	Not limited

Complete Stack Test and RATA results from 2016-2020 are included in the response as attachments as well as all associated testing data. Please see documents

5.3.4-5.3.7 (2016 test data) 5.4.4 (2017 test data), 5.5.4 (2018 test data), 5.6.4-5.6.5 (2019 test data), 5.7.4-5.7.7 (2020 test data), and 5.8.1-5.8.2 (2021 test data).

Production was not limited during stack tests.

- ii. Copies: Provide copies of the summary pages, including the results, for each emissions test, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.

Summary pages of all stack test results and RATA results are included in two interactive spreadsheets (“5.1 Stack Test Results by Year” and “5.2 RATA Results Summary By Year”)

- iii. In electronic chart format (Microsoft Excel compatible), provide daily and monthly total mass (in lbs) and rates (in lb/MMBTU) of emissions from the Facility for nitrogen oxides (“NOx”), sulfur dioxide (“SO2”), carbon monoxide (“CO”), particulate matter (“PM”), and hydrochloric

acid ("HCl"), and average opacity, including all supporting calculations, log sheets, continuous emissions and opacity monitoring system data, and measurements used to determine emissions. These emissions or other operating parameter data must be provided, even if the calculations are based upon source test emission factors and daily energy production. If spreadsheets are used to calculate emissions, provide a formula for each column in the spreadsheet.

All requested information is provided with the attachments, presented as 23 Excel files, documents 7.1-7.23.

- b. Provide all records of emission calculations and failed emissions tests required for compliance with Title V emission limits for CO, HCl, NO_x, SO₂, PM, and hydrocarbons or other volatile organic compounds ("VOCs").
See included stack test cover letter from 2020 HCl test, "5.7.4 2020 DVP 10 Day Response to Exceedance of HCl_Boiler MACT Comp Test_073120"

- c. Identify the cause of any failed emissions tests.
The letter referenced above in B provides causes for failed tests.

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6. For each process unit and/or process step at the Facility that has the potential to emit any air pollutant, including but not limited to SO₂, NO_x, PM, CO, HCl, and hydrocarbons, provide a description of how the emission unit or process step functions, and identify operational parameters including, but not limited to, normal and maximum processing temperatures and normal and maximum feed rates. For any process unit and/or process step that you conclude does not have the potential to emit any pollutants, please provide a copy of any documents upon which you relied for that conclusion.

Desert View Power's potential to emit is listed in the table below, Table 6-2 on p.16 of "3.3 DVP Final Statement of Basis".

Table 6-2 Source Post-Control* Potential to Emit (tons/yr)

Emission Unit	NO _x	VOC	SO ₂	PM ₁₀	CO	Pb	HAP
01	237	52	105	34	263	1.5E-02	69
09	1.4	0	0	0	0		0
10	0.9	0	0	0	0		
Total	239	88	105	34	305	1.53E-02	69

* Allowable levels are based upon the federally enforceable emissions limitations for only those units that have allowable emissions limitations lower than their potential to emit. See Appendix A for calculation details.

The following excerpt is from "5.7.7 2020 RATA W002AS-678786-RT-945", page 9.

2.0 UNIT DESCRIPTION

The Desert View Power Plant consists of two 297 MMBtu/hr, circulating bed, biomass-fired boilers. The combined units are designed to produce 47 MW of net electrical output. Each unit is equipped with the following pollution control systems:

- An ammonia injection system for control of NO_x emissions
- Cyclonic mixing of injected ammonia with flue gas to provide for a minimum amount of ammonia slip (emission)
- A limestone injection system to limit emissions of SO₂
- A reverse air baghouse to control opacity and emissions of sulfates and particulate to very low levels

The plant CEMS system for each unit includes measurements of NO_x, O₂, CO, O₂ wet, SO₂, CO₂, flow and opacity. It is an extractive system with a heated line extending from the probe to the CEMS unit. Table 2-1 presents the current CEMS configuration.

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Additionally, the following excerpt is from DVP Title V permit document “3.1 DVP Final Title V permit”, page 5

I.B. Emission-Generating Units and Activities

Emission Unit I.D. No.	Unit Description	Associated Control Equipment	Control Equipment I.D. No.
EU-01	Boilers 1 & 2 Combustion Engineering Circulating Fluidized Bed Boilers, 300 million Btu/hr each, Siemens ABB VAX Turbine Generator, Total Net Electrical Output: 47 MW	Thermal de-NO _x system	01-C01
		Fabric Filter/Baghouse	01-C02
		Hydrated Lime/Dry Sorbent Injection System	01-C03
EU-03	Biomass fuel yard – wind erosion	Wind screens	03-C01
EU-04	Fuel hog and cyclone	Enclosure, Fabric Filter/Baghouse	04-C01
EU-05	Fuel stacker	Enclosure	05-C01
EU-06	Petroleum coke storage	Partial enclosed building	06-C01
EU-07	Fly Ash Storage Silo	Fabric Filter/Baghouse	07-C01
EU-08	Cooling tower	Drift controls	08-C01
EU-09	Emergency generator, Generac Model 32868-12688, 275 kW, 60 Hz, 440 HP	n/a	
EU-10	Fire pump, Cummins Model NT 855 F3, 290 HP	n/a	
EU-11	Hydrated Lime Storage Silo	Fabric Filter	11-C01
EU-13	Hydrated Lime Truck Traffic	n/a	
EU-14	Wood chips conveyor system	Partial covers and water sprays	14-C01

See also the description in “3.3 DVP Final Statement of Basis”, pages 10-13:

Steam Generation

The two boilers (collectively, EU-01) are designed to generate a total of 427,520 lbs/hr of steam at 950°F and 1,250 pounds per square inch gauge (psig). Each unit includes the following: fuel metering and feed system, fluidized bed combustor, forced circulation boiler system, air preheater system, bed removal cooling system, bed level control system, bag

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filter system, auxiliary gas burners (with piping) system, combustion air and flue gas handling system, ammonia injection system, structural steel, platforms, and ladders.

Ash Handling System

Ash handling is performed in part by the baghouses/fabric filters. The function of the ash handling system is to collect bottom and fly ash intermittently and continuously from various sections of each individual fluidized bed combustor and the baghouse filters. Each fluidized bed combustor is provided with an individual ash handling system, and the collected ash from both systems is transported into one common fly ash storage silo (EU-07).

The ash handling system consists of dry drag chain conveyors, screw conveyors, and an ash storage silo with an unloader. Ash collected from the fluidized bed combustor bed drain outlets, economizer hoppers, air preheater hoppers, and baghouse filter hoppers is discharged through individual drag chain conveyors into a common transfer conveyor. It is then transported into a common storage silo via drag chain conveyor and is unloaded through an ash conditioner to a truck for agricultural soil amendment or landfill disposal. Water is used in the conditioner for dust control.

Flue Gas Handling and Emissions Control

The flue gas handling and cleaning system for each individual fluidized bed boiler consists of a cyclone, economizer, air preheater, baghouse filter, induced draft fan, interconnecting ducts and breeching, and a common stack. The system is designed to monitor the pollutant level from the stack continuously in accordance with requirements and performance specifications delineated in 40 CFR 60.13, 40 CFR part 60, Appendix B (Performance Specification 2), and 40 CFR part 52, Appendix E, and consistent with SCAQMD requirements.

Emission control equipment employed at the facility includes the following:

- A circulating fluidized bed combustor for promotion of complete combustion and minimization of VOC and CO emissions.
- A thermal deNO_x ammonia injection system (01-C01), which is designed to provide a large turbulent volume at the proper temperature for reaction of the ammonia with oxides of nitrogen to reduce NO_x emissions.
- A fabric filter/baghouse (01-C02) for capture of particulate emissions with provision for removing individual groups of filter bags from the gas flow to prevent re-entrainment of dislodged particulate during the cleaning cycle.
- A combustor limestone injection system to reduce SO₂ emissions.
- A DSI system using hydrated lime (01-C03) for the control of HAPs and HCl.
- Fabric filter/baghouses for the fuel hog and cyclone, fly ash storage silo, limestone storage silos, and the hydrated lime storage silos.

Support and Auxiliary Equipment

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The facility also includes the following equipment:

- Hydrated Lime truck traffic (EU-13): Includes deliveries of hydrated lime
- Biomass fuel yard (EU-03): Equipped with wind screens to prevent PM emissions from wind erosion
- Fuel stacker (EU-05): Uses a moveable conveyor to stack fuel prior to loading on the fuel hog
- Fuel hog and cyclone (EU-04): Equipped with an enclosure and fabric filter/baghouse
- Wood chips conveyor system (EU-14): Equipped with partial covers and water mist for PM control
- Storage silos: fly ash – EU-07; hydrated lime – EU-11; limestone storage silo – EU-12: Each equipped with fabric filter/baghouses
- Petroleum coke storage (EU-06): For storage of petroleum coke, TDF, and other fuels not capable of being immediately processed (system no longer used)
- Cooling tower (EU-08): Cools down the boiler heat exchange water
- Emergency generator (EU-09): Used for emergency operation only
- Emergency fire pump engine (EU-10): Used for emergency fire response only

7. Provide full copies of Capacity Factor calculations conducted at the Facility for any reason, from January 1, 2017 to the present.

DVP has not performed a capacity test during this timeframe.

"2.1 2017-current annual production" provides the monthly generation and annual capacity factor calculations from January 2017-March 2021.

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8. For each biomass-fired boiler at the Facility, provide:
- The unit identification number;
At site, the units are referred to as Unit 1 and Unit 2, or Boiler 1 and Boiler 2.
By permit, both are combined as "EU1" as identified in the current facility Title V permit (Page 5 of "3.1 DVP Title V Permit-Final")
 - The date commercial operation began;
February 1992
 - The original design capacity (megawatts gross, MWg/net generating capacity);
55 MW gross, 47 MW net (hourly electricity output)
 - Current gross and net generating capacity
55 MW gross, 47 MW net (hourly electricity output)
 - The original design and current maximum heat input capacity (MMBTU/hr);
300 MMBTU/hr, per boiler
 - The original design and current steam flow output capacity (lbs steam/hr);
232,000 per boiler
 - The current operating status of the boiler;
Operating
 - The scheduled or planned boiler retirement date;
None
 - Current fuel(s) being fired;
The facility currently utilizes biomass and natural gas.
 - Type of PM emissions control and year installed;
Each boiler is equipped baghouse/fabric filter for PM control. (Original installation, 1991)
 - Type of SO₂ emissions control and year installed;
Limestone injection system that injects limestone into the fuel feed to the combustion chamber for SO₂ control. (Original installation, 1991)
 - Type of NO_x emission controls and year installed;
A thermal DeNO_x ammonia injection system, staged combustion, and low combustion operating temperature for NO_x control. (Original installation, 1991)

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- m. Type of CO emission controls and year installed;
Good combustion practices.
- n. Type of hydrocarbon emission controls and year installed;
N/A
- o. Type of HCl emission controls and year installed;
DSI (Dry sorbent injection) injection system that injects hydrated lime prior to the baghouse for HCl control. Installed and operating in 2016.
- p. Any anticipated emission controls and estimated dates of installation; and,
N/A
- q. Provide documentation describing how a minimum dry sorbent injection rate as defined in 40 CFR 63.7575 has been established and how an operating limit pursuant to Table 7, Item 2b requirements (under 40 CFR Part 63, Subpart DDDDD) has been developed. Also, provide documentation describing how an alternative site-specific maximum SO₂ emission rate according to §63.7530(b), if applicable, has been established.
While DVP does operate a sorbent injection system for reduction of HCl emissions, DVP has chosen to comply with the operating limit option in Table 7, Item 2c, instead of Item 2b. Therefore, DVP is not required to establish a minimum dry sorbent injection rate.

Table 7, Item 2c is the “alternative maximum SO₂ emission rate” option. The operating limit for SO₂ is established using HCl performance test results and SO₂ CEMS data. The current maximum SO₂ emission rate was set equal to the highest hourly average SO₂ emissions rate measured during the performance testing conducted in March 2021. The backup documentation for establishing the SO₂ limit is provided (“2.2 HCL SO₂ Surrogate operating limit”)

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9. Provide copies of the following existing records for the emission control device(s) at the Facility:

a. The make, model number, and description/specification of each control device;

See attachments identified below:

Baghouse: see "1.3 Baghouse System"

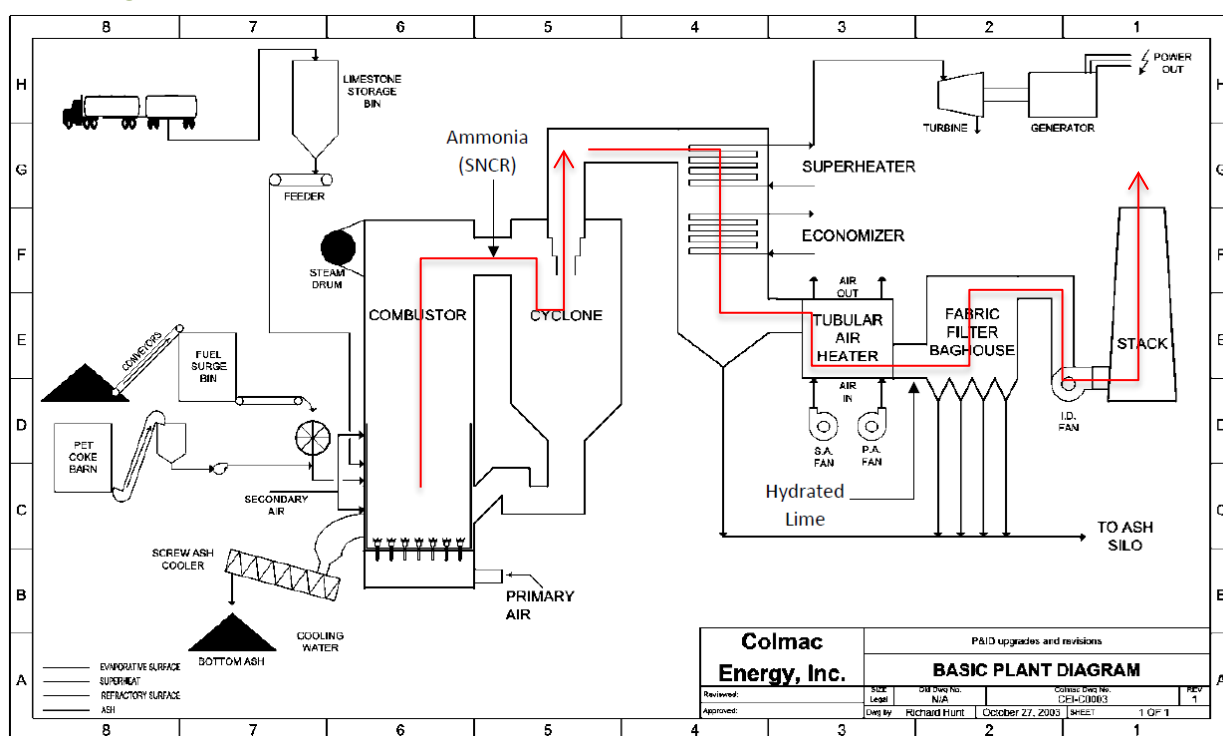
SNCR system: see "1.4 SNCR System"

Limestone system: see "1.5 Limestone feed system"

Hydrated lime system: "1.6 Hydrated lime system"

b. Detailed explanation of how emissions are routed, including a description of any capture mechanism;

See below from "1.7 DVP flue gas path". Additional information was provided in Response #6 from "3.3 DVP Final Statement of Basis", pages 10-13.



c. Documentation of how emissions factors, including capture efficiencies, were derived, at each process emission point from the use of each control device and the maximum hourly emission rates used to determine emissions;

Fabric Filter/Baghouse: Emission factors for particulate matter are derived from the most recent annual stack test conducted at the outlet of the baghouse stack. These tests are conducted at or near maximum operating load and the test results reflects the maximum hourly emission rate. This emission factor is used for the annual emissions report.

Thermal De-NO_x System: Emission factors for nitrogen oxides (NO_x) are based on CEMS data. This data is used for the annual emissions report.

Hydrated Lime/Sorbent Injection System: Emission factors for sulfur dioxide (SO₂) are based on CEMS data. This data is used for the annual emissions report. Emission factors for hydrogen chloride can be derived from the most recent annual stack test. These tests are conducted at or near the maximum operating load and the test results reflect the maximum hourly emission rate.

- d. A list of operating limits for each emission control device, the method used to establish the values, and the effective date of these operating limits; and
Fabric Filter/Baghouse: Emissions from the fabric filter are monitored using a COMS. The operating limit was established in the CAM Plan. The Title V permit condition II.C.24 defines an excursion of the PM₁₀ emission limit as an opacity reading that exceeds the average hourly opacity reading of 7.5%. The effective date of this permit condition is October 30, 2020.

Thermal De-NO_x System: A NO_x CEMS is used to monitor emissions from the two boilers. No other monitoring of the emission control device is required. The requirement for the NO_x CEMS is from the initial PSD permit SE 87-01 which was effective June 28, 1988.

Hydrated Lime/Sorbent Injection System: A CEMS is used to monitor SO₂ emissions from the two boilers. The requirement for the SO₂ CEMS is from the initial PSD permit SE 87-01 which was effective June 28, 1988. In accordance with the Boiler MACT provisions in 40 CFR 63 Subpart DDDDD, the operating limit for HCl emissions is the 30-day rolling average SO₂ emission rate at or below the highest hourly average SO₂ concentration measured during the annual HCl performance test. The effective date of this operation limit is January 31, 2016.

- e. Any biomass-boiler bed operating temperature measurements.
See “2.4 U1 Lower Combustor Temps” and “2.5 U2 Lower Combustor Temps”.

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10. Pertaining to the permitting status of the Facility, provide copies of the following:

- a. Each current air permit;
See current Desert View facility Title V permit (Documents “3.1 DVP Title V Permit-Final” and “3.2 DVP PSD Permit-Final”)
- b. Each/all permit application(s) and supporting documents for each air permit or for each air permit that the Facility is currently seeking, whether or not such a permit has been issued or proposed;
DVP is currently not seeking any air permits, modifications, or variances.
For supporting information from the most recent Title V issuance in September 2020, see “3.3 DVP Final Statement of Basis” and “3.4 DVP Response to Comments”
- c. Any major source permits issued at any point, including Prevention of Significant Deterioration (“PSD”) and New Source Review (“NSR”) permits;
See document “3.2 DVP PSD Permit-Final”
- d. Any synthetic minor permits; and
DVP does not have any synthetic minor permits
- e. Any District analysis or correspondence pertaining to each permit and/or each permit application identified in response to Requests #10a. and #10b.
USEPA Region 9 has been the permitting authority for all permits issued to DVP, so there was no District (SCAQMD) analysis required for these permits.
DVP is unaware of any District correspondence regarding our current permits.

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11. Provide in chart form a list of each and every capital project, with a cost of more than \$50,000, for the Facility for which:
- Began actual construction after January 1, 2010; and
 - Those which are approved or expected to begin construction in the next 36 months.

See “6.0 DVP CapEx projects” and documents as referenced therein. Desert View Power’s existing power purchase agreement (“PPA”) will expire in April 2022. As such, DVP does not have firm plans for capital projects beyond the life of the PPA. Please note that DVP has provided 5 years of information from the date of the request consistent with recordkeeping requirements of Condition III.B.2 of the Title V permit.

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12. For each project identified in response to Request #11, include the following information in a list format:

- a. The work order number for the project;
- b. Project description;
- c. Authorized or projected expenditure;
- d. Actual expenditure;
- e. Date of approval;
- f. Project completion date or expected completion date;
- g. In-service date;
- h. Identification of each original equipment manufacturer ("OEM"), equipment suppliers, or contractors that will provide or have provided engineering, fabrication, and/or installation services for the project; and
- i. State whether the capital project was associated with a life extension project, capacity increase, efficiency enhancement, or reliability improvement.

See "6.0 DVP CapEx projects" and documents as referenced therein. Please note that DVP has provided 5 years of information from the date of the request, consistent with recordkeeping requirements of Condition III.B.2 of the Title V permit.

13. For each project identified in response to Request #11 also provide copies of the following documents, records or information:

- a. All capital appropriation requests and/or approvals for such expenditures, regardless of format or title of such request and/or approval;
- b. All emission calculations performed before and after the capital project was completed;
- c. All correspondence with the District or any regulatory agency regarding the potential applicability or exemption of any provision of the Clean Air Act or the applicable State Implementation Plan ("SIP"), including, but not limited to, NSR/PSD, New Source Pollution Standards ("NSPS"), National Emission Standards for Hazardous Air Pollutants ("NESHAP"), and opacity requirements;
- d. All engineering analyses, correspondence, memoranda, telephone discussion summaries, and any other communications, including, but not limited to, Board of Directors reports, meeting minutes, and annual reports, that describe the original as-built performance and performance for the period immediately before and immediately following completion of each capital project, the benefits, provide justification for, or otherwise explain the nature, extent, cost, and frequency of each capital project. This request includes communications both before and after the capital project was undertaken;
- e. All associated purchase orders;
- f. All contracts relating to purchase of equipment and on-site installation or construction for the project;
- g. Any permits received for the project; and
- h. Documents related to the maximum continuous rating of the boiler, both before and after the project was completed, including, but not limited to, documentation of changes in:
 - i Unit capacity factor;
 - ii Unit availability;
 - iii Boiler heat input;
 - iv Steam flow rate;
 - v Steam temperature;
 - vi Steam pressure;
 - vii Unit heat rate (BTU/MWh); and
 - viii Unit efficiency.

See "6.0 DVP CapEx projects" and documents as referenced therein. Please note that DVP has provided 5 years of information from the date of the request consistent with recordkeeping requirements of Condition III.B.2 of the Title V permit.

14. In chart form, identify and provide monthly quantities of each type of fuel burned at the Facility since January 1, 2010.

Please see “2.3 2016-2021 fuel consumption by type”. Please note that DVP has provided 5 years of information from the date of the request consistent with recordkeeping requirements of Condition III.B.2 of the Title V permit.

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15. For the Facility, provide copies of all documents, including reports, correspondence, memoranda, and phone discussion summaries, related to PSD, NSR, NSPS, or NESHAP applicability for any construction or modification undertaken between January 1, 2010, and the date of this Request.

Please see “6.2.3 2015 Application to EPA” and “6.2.4 2015 EPA Administrative Amendment Letter to Desert View Power 5-22-2015”. Please note that DVP has provided 5 years of information from the date of the request consistent with recordkeeping requirements of Condition III.B.2 of the Title V permit.

16. Identify in an electronic spreadsheet (Microsoft Excel compatible) all time periods (including their dates between January 1, 2017 and the date of this Request) when the boiler or any of the continuous emissions control devices and CEMS that were non-operational, along with the reason(s) they were not operating.

See attached CEMS downtime data: Unit 1: "7.19 U1 Downtime 1.1.17-5.3.21" and "Unit 2: "7.20 U2 Downtime 1.1.17-5.3.21"

17. Pertaining to the compliance status of the Facility, provide copies of any notices or documents issued by the state and/or local air permitting authority or authorities pertaining to the following:

- a. Major or Minor Deficiency;
None issued within the past 5 years
- b. Significant Non-Compliance ("SNC");
None issued within the past 5 years
- c. Non-Reporting;
None issued within the past 5 years
- d. Permit Exceedance;
None issued within the past 5 years
- e. Notices of Opportunity to Correct ("NOC");
None issued within the past 5 years
- f. Notices of Violation ("NOV");
None issued within the past 5 years
- g. Administrative Order; or
None issued within the past 5 years
- h. Civil Complaint.
None issued within the past 5 years

There have been no notices as set forth above during the past 5 years. Please note that DVP has provided 5 years of information from the date of the request consistent with recordkeeping requirements of Condition III.B.2 of the Title V permit.

18. For the Facility, provide complete corporate or individual name, provide a list of all owners and operators, including all previous owners and operators, since initial construction of the Facility to the present, including the date of any transfers and the percentage ownership for each owner of the Facility and/or the percent ownership of member or shareholder of each corporation or LLC that owned the Facility. If known, provide the current address, phone number, and state(s) of residence and/or incorporation for each past or current owner, shareholder or member.

DVP acquired the Facility from Colmac Energy, Inc. in January, 2011. DVP is continuing to review its records for ownership prior to Colmac Energy, Inc. and will provide an update to this request as warranted.

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19. Provide a copy of the Facility's current power purchase agreement.
See "1.2 2012-04-18 PPA DVP-IID"

20. What are the 6-digit North American Industry Classification System ("NAICS") codes used at your address since the plant commenced operations?

NAICS CODE 221117, Biomass Electric Power Generation

SIC CODE 4911, Electric Services

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21. Provide all copies of Forms A or Forms R drafted or filed under Toxic Release Inventory ("TRI") or Emergency Prevention and Community Right to Know Act ("EPCRA") Section 313 (see 40 C.F.R. §372.30), if applicable.

DVP is not subject to TRI reporting.

22. Provide all copies of Safety Data Sheets (“SDS”) that you publish or have on file.
All DVP’s safety data sheets are attached, see 8.1-8.92.

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23. Quantify the number of full-time employees or their equivalent for each Calendar Year beginning with 2017. (See 40 C.F.R. §372.3.)

2017: 34

2018: 32

2019: 33

2020: 33

2021: 33 (as of April 2021)

24. What are the TRI-listed chemicals you manufactured, processed, or otherwise used in quantities equal to or greater than the respective reporting threshold in the course of a calendar year beginning with 2017? (See 40 C.F.R. §§ 372.25 and 372.65.)

DVP is not subject to TRI reporting

25. State the chemicals, their respective operations or uses, and their respective quantities for each year.

Please see “1.8 DVP Chemicals from RMP” for list of chemicals from DVP RMP plan.

26. Provide daily records of the amounts and types of biomass fuel fired each calendar quarter, the amount of natural gas fired each calendar quarter, the amount of petroleum coke fired each calendar quarter, the amount of railroad ties fired each calendar quarter, the amount of tire-derived fuels ("TDF") fired each calendar quarter, the amount of corrugated paper waste fired each calendar quarter, and the plant hours of operation. (See Section II.D. Recordkeeping Requirements of the Part 71 Permit No. CB-ROP 05-01, Sept. 2020.)

Please see "2.3 2016-2021 fuel consumption by type". Please note that DVP has provided 5 years of information from the date of the request consistent with recordkeeping requirements of Condition III.B.2 of the Title V permit.

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27. Provide the annual capacity factor individually for petroleum coke, natural gas, and wood for the reporting period. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. (See Section II.D. Recordkeeping Requirements of the Part 71 Permit No. CB-ROP 05-01, Sept. 2020.)

Please see “2.3 2016-2021 fuel consumption by type”. Please note that DVP has provided 5 years of information from the date of the request consistent with recordkeeping requirements of Condition III.B.2 of the Title V permit.